

Joshua Woodard (Bar #015592)
jwoodard@swlaw.com
Audrey E. Chastain (Bar #033998)
achastain@swlaw.com
SNELL & WILMER L.L.P.
One East Washington Street
Suite 2700
Phoenix, AZ 85004
Telephone: (602) 382-6000
Facsimile: (602) 382-6070

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Jane Doe,

Plaintiff,

V.

Embry-Riddle Aeronautical University, Inc.,
a Florida not for profit Corporation,

Defendant.

No. 3:24-cv-08100-SMB

**JOINT STIPULATION FOR
EXTENSION OF CASE
DEADLINES**

(Second Request)

Pursuant to LRCiv 7.3, the parties respectfully submit the following Joint Stipulation and separate Proposed Order and request that the Court modify its Case Management Order [Doc. 44] and January 15, 2025 Order [Doc. 62] to extend the remaining case deadlines by approximately 60 days, as set forth below. This is the second request by the parties for the modification of the Case Management Order [Doc. 44].

Good cause exists for the requested extensions because the parties have engaged in written discovery, have exchanged multiple disclosure statements, and Plaintiff has taken the Rule 30(b)(6) deposition of Embry-Riddle Aeronautical University, Inc. (“ERAU”). However, due to circumstances beyond the parties’ control, including ERAU’s, Plaintiff’s, and counsel’s work-related schedules, the parties are unable to complete discovery – including ERAU’s taking Plaintiff’s deposition – under the present deadlines.

1 Accordingly, the parties request an approximately 60-day extension on each of the
 2 remaining case deadlines, as follows:

Event	Current Deadline	Proposed Deadline
Fact Discovery	3/28/2025	5/30/2025
Expert Disclosures	5/2/2025	7/3/2025
Rebuttal Expert Disclosures	5/30/2025	8/1/2025
Expert Depositions	6/27/2025	8/29/2025
Good Faith Settlement Talks	4/18/2025	6/20/2025
Dispositive Motions	7/28/2025	9/26/2025

10 For the foregoing reasons, the parties respectfully request that the Court enter the
 11 separate Proposed Order lodged concurrently with this Stipulation.

12 DATED this 25th day of March, 2025.

13 LEHRMAN LAW

14 By: s/ Seth M. Lehrman
 15 Seth M. Lehrman
 16 6501 Park of Commerce Blvd.
 17 Suite 253
 18 Boca Raton, FL 33487
 19 Attorneys for Plaintiff

SNELL & WILMER L.L.P.

20 By: s/ Joshua Woodard
 21 Joshua Woodard
 22 Audrey E. Chastain
 23 One East Washington Street
 24 Suite 2700
 25 Phoenix, AZ 85004
 26 Attorneys for Defendant

GALLAGHER & KENNEDY, P.A.

27 By: s/ Matthew R. Boatman
 28 Matthew R. Boatman
 29 2575 E. Camelback Rd., 11th Floor
 30 Phoenix, AZ 85016
 31 Attorneys for Plaintiff

4901-7346-4108